

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

Felicias estate, heir and Successor  
Jamhal Talib Abdulhach Beg

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Specialized Loan Servicing LLC, Nick Oldfield  
Toby Wells, Debra Aydelotte, Tam Milroy  
Brian Simons, Jim Smith, Massie Pitts Diller et al

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. CA 19-067

(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No  
(check one)

2019 FEB 14 A 10:25

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Jamhal Talib Abdullah Bey  
 Street Address 44 Carr St  
 City and County [Providence] [Providence] Nahiganset  
 State and Zip Code [Rhode Island 02905]  
 Telephone Number 401-463-5126  
 E-mail Address Rise of the Moors@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name Nick Oldfield  
 Job or Title CEO Computershare Loan Services  
 (if known)  
 Street Address 8742 Lucent Blvd 300  
 City and County Littleton  
 State and Zip Code Colorado 80129  
 Telephone Number 720-241-7200  
 E-mail Address \_\_\_\_\_  
 (if known)

## Defendant No. 2

Name Toby Wells  
 Job or Title CEO Specialized Loan Services  
 (if known)  
 Street Address 8742 Lucent Blvd 300  
 City and County Littleton

State and Zip Code Colorado 80129  
Telephone Number 720-241-7200  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

Defendant No. 3

Name Deborah Aydelotte  
Job or Title Ceo of the Lenderlive Integration  
(if known) \_\_\_\_\_  
Street Address 8742 Luxent Blvd 300  
City and County Littleton  
State and Zip Code Colorado 80129  
Telephone Number 720-241-7200  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

Defendant No. 4

Name Tom Million  
Job or Title Ceo and Chairman, Capital Markets  
(if known) cooperative  
Street Address 8742 Luxent Blvd 300  
City and County Littleton  
State and Zip Code Colorado 80129  
Telephone Number 720-241-7200  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

~~A. If the Basis for Jurisdiction Is a Federal Question~~

~~List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.~~

~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Jamhal T. A. Bey, is a citizen of  
the State of (name) Morocco.

~~b. If the plaintiff is a corporation~~

~~The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name) \_\_\_\_\_.~~

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of  
the State of (name) \_\_\_\_\_. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

- b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is  
incorporated under the laws of the State of (name)  
\_\_\_\_\_, and has its principal place of  
business in the State of (name) \_\_\_\_\_. Or is  
incorporated under the laws of (foreign nation)  
\_\_\_\_\_, and has its principal place of  
business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an  
additional page providing the same information for each additional  
defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant  
owes or the amount at stake—is more than \$75,000, not counting interest  
and costs of court, because (explain):

36,000

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as  
briefly as possible the facts showing that each plaintiff is entitled to the damages or other  
relief sought. State how each defendant was involved and what each defendant did that  
caused the plaintiff harm or violated the plaintiff's rights, including the dates and places  
of that involvement or conduct. If more than one claim is asserted, number each claim  
and write a short and plain statement of each claim in a separate paragraph. Attach  
additional pages if needed.

Pursuant to Federal law 28 USC 2672, 18 USC 153, 18 USC 1001 and 18 USC 1349.  
The aforementioned defendants did commit fraud, attempt to conspire  
against our estate with the intent to embezzle the estate by sending  
threatening communications in the mail, making false statements in  
regards to unlawfully foreclosing on our estate. The defendants being  
the principal agents of SLS would have benefited from this embezzlement.

## IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Pursuant to 28 USC 2672, 18 USC 153, 18 USC 1001 and 18 USC 1344 \$16,000 is being demanded and an additional \$20,000 for mental anguish and emotional distress

## V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

## A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 2/13, 2019.

Signature of Plaintiff

Printed Name of Plaintiff

Jumhal Talib Abdullah Bey  
Jumhal Talib Abdullah Bey



## B. For Attorneys

Date of signing: \_\_\_\_\_, 20\_\_\_\_.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address

## CONTINUATION PAGES

## The Defendant(s) - Continuation

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 5

Name Brian Simons  
 Job or Title CEO, Credit Risk Solutions  
 (if known)  
 Street Address 8742 Luccas blvd 300  
 City and County Littleton  
 State and Zip Code Colorado 80129  
 Telephone Number 720-241-7200  
 E-mail Address \_\_\_\_\_  
 (if known)

## Defendant No. 6

Name Jim Smith  
 Job or Title President, Property Solutions  
 (if known)  
 Street Address 8742 Luccas blvd 300  
 City and County Littleton CO 80129

## Defendant No. 7

Name Maggie Pitts-Dilley  
 Job or Title \_\_\_\_\_  
 (if known)  
 Street Address 1080 Main Street  
 City and County Pawtucket  
 State and Zip Code Rhode Island 02860  
 Telephone Number \_\_\_\_\_  
 E-mail Address \_\_\_\_\_  
 (if known)



Defendant No. 8

Name

Beatrice

Job or Title

Teller ID 4916

(if known)

Street Address

City and County

Katina  
Teller ID 19405

Statement of Claim - Continuation

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

[Redacted content]